

Section Ten

Plan Maintenance Process

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10.1 IFR Requirements for Plan Maintenance Process

The IFR requires State Standard Hazard Mitigation Plans to include a section describing the plan maintenance process the State will use to ensure the Plan remains current (§201.4(c)(5)(i-iii)). The IFR requirements cover three areas regarding the process of maintaining the Plan once it is approved:

- **Monitoring, Evaluating and Updating the Plan** per **Requirement §201.4(c)(5)(i)**: “[The Standard State Plan Maintenance Process must include an] established method and schedule for monitoring, evaluating, and updating the plan”;
- **Monitoring Implementation of Mitigation Measures and Project Closeouts** per **Requirement §201.4(c)(5)(ii)**: “[The Standard State Plan Maintenance Process must include a] system for monitoring implementation of mitigation measures and project closeouts”; and
- **Reviewing Progress on Goals, Activities and Projects** per **Requirement §201.4(c)(5)(iii)**: “[The Standard State Plan Maintenance Process must include a] system for reviewing progress on achieving goals as well as activities and projects in the Mitigation Strategy.”

It is important to note the differences between the first requirement and the other two. §201.4(c)(5)(i) focuses on the maintenance of the Plan itself while §201.4(c)(5)(ii) and §201.4(c)(5)(iii) are both concerned with progress made in implementing the Plan’s recommendations.

10.2 Monitoring, Evaluating and Updating the Plan

By law, the Plan must be updated every three years prior to re-submittal to FEMA for re-approval³³. However, it is anticipated that over the next three years, there will be a need and a desire to update all or part of the Plan on a more frequent basis. Therefore, the first part of this subsection describes the whole update process, including:

- responsible parties
- methods to be used,
- evaluation criteria to be applied, and
- scheduling for monitoring, and evaluating the Plan.

These descriptions are followed by an explanation of how and when the Plan will be periodically updated.

³³ As noted previously, the State Plan must be updated and reapproved every three years but local and parish plans only need to be updated and reapproved by FEMA every five years.

Responsible Parties

OHSEP is the State agency directly responsible for maintaining the Plan. Within that agency, the State Hazard Mitigation Officer (SHMO) is the individual responsible for assuring that monitoring and evaluating the Plan are done in accordance with the following procedures. The SHMPC is responsible for developing periodic updates to the Plan.

Methods for Monitoring and Evaluating the Plan

On a quarterly basis (and as warranted by circumstances such as a major disaster declaration) OHSEP will monitor the Plan to assess the degree to which assumptions and underlying information for the Plan may have changed. For example, OHSEP will look for:

- Changes in the information available to perform vulnerability assessments and loss estimates. For example, as discussed in Section Nine, as local risk assessments and plans are integrated into this Plan, OHSEP will be soliciting feedback from local EMA directors about any changes in their real or perceived risks.
- Changes in laws, policies and regulations. For example, FEMA has discussed developing a Final Rule after the May 1, 2005 DMA 2000 plan submittal deadline to refine the requirements for implementing the DMA 2000.
- Changes in state agencies and/or their procedures, including the OHSEP itself and the administration of grant programs.

The results of these monitoring efforts will be made available to the SHMPC as they are produced.

Using the compiled results of on-going monitoring efforts, the Plan will be evaluated annually, generally starting in the month of January (unless circumstances indicate otherwise). OHSEP will initiate the evaluations by contacting state agencies identified as responsible parties in the Mitigation Action Plan (see Section Eight), as well as other agencies and organizations that have been involved in developing the Plan.

OHSEP and the SHMPC have the prerogative to determine if other organizations should also be involved. The SHMPC will be encouraged to recommend other agencies or organizations that should be included in the evaluation, for example those with specific technical knowledge about risks.

The initial contacts will be made no later than December of each year for the first two years and in September in the third year (in anticipation of the required Plan update for FEMA re-approval). The initial contact will advise the appropriate organizations that the Plan will be re-evaluated in the coming months, and request their participation.

OHSEP also has the prerogative to evaluate and update the Plan at times other than those identified in this section, under the following general conditions:

0. After a major disaster declaration.
0. At the request of the Governor.
0. When significant new information regarding risks or vulnerabilities is identified (per processes identified in Section Eight).

Plan Evaluation Criteria

The evaluations will consider several basic factors, similar to the issues covered in the monitoring process, and any additional review indicated by OHSEP or the SHMPC. The factors that will be taken into consideration during these periodic evaluations of the Plan include:

0. Changes in vulnerability assessments and loss estimations. The evaluation will include an examination of the analyses conducted for hazards identified in the Plan and determine if there have been changes in the level of risk to the State and its citizens to the extent that the Plan (in particular the strategies and prioritized actions the State is considering) should be modified.

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“Changes” in this context could result simply from the development of better data than was used in the original study and the incorporation of information from local plans consistent with the action items in Section Eight.

0. Changes in laws, policies, or regulations. The evaluation will include an assessment of the impact of changes in relevant laws, policies and regulations on the basic assumptions included in the Plan.
0. Changes in state agencies or their procedures (in particular OHSEP, which is responsible for maintaining the Plan) that will affect how mitigation programs or funds are administered.
0. Significant changes in funding sources or capabilities.
0. Progress on mitigation actions (including project closeouts) or new mitigation actions that the State is considering.

Updating the Plan

Updates will follow the original planning process outlined in Section Three of the Plan. The update process will entail a detailed and structured re-examination of all aspects of the original Plan, followed by recommended updates. The update process will be undertaken by the SHMPC and supported by OHSEP. The recommendations will be presented to the SHMT for consideration and approval. It is expected that the Governor will issue a letter of adoption for each update of the Plan.

At a minimum, the Plan will be updated and re-submitted to FEMA for re-approval every three years, as required by law. The three-year update for FEMA re-approval will require that all the original steps outlined in Section Three be revisited to make sure the Plan assumptions and results are still valid as a basis for further decision making and priority setting.

The Plan will also be subject to interim updates as significant changes or new information is identified in the periodic evaluations described above. The degree to which the whole process is repeated will depend on the circumstances that precipitated the update. For example, the introduction of new data regarding vulnerability to one of the identified hazards might create the need for an update to the portion of the Plan that relates to that hazard but not much else.

OHSEP will initiate, coordinate and lead all Plan updates in conjunction with the SHMPC. The next two paragraphs describe the procedures for interim and three-year updates, respectively.

Updates Resulting from Interim Evaluations

The nature of Plan updates will be determined by the evaluation process described above. In general, OHSEP will notify the SHMPC that the agency is initiating an interim Plan update, and describe the circumstances that created the need for the update (per the list in the Plan Evaluation Criteria section above). OHSEP will determine if the SHMPC should be consulted regarding potential changes. If it is determined that the SHMPC should be involved, the nature of the involvement will be at the discretion of OHSEP. When interim updates are completed, if the SHMPC was not involved, OHSEP will advise all SHMPC members via email that the Plan has been updated, and describe the nature of the update. In addition, OHSEP will provide FEMA Region VI with a copy (although there is no requirement to have the Plan re-approved by FEMA for interim updates).

Updates Related to the Required Three-year Plan Review

As required by the DMA 2000, the Plan will be updated every three years and re-submitted to FEMA for re-approval. In those years, the evaluation process will be more rigorous, and will examine all aspects of the Plan in detail. It is anticipated that several meetings of the SHMPC will be required and that the Governor will formally re-approve the Plan prior to its submission to FEMA.

Based on the May 1, 2005 deadline for the initial Plan, OHSEP anticipates that the submission date for the required update will be approximately May 2008. Prior to that time, OHSEP will contact SHMPC members and other appropriate agencies and organizations to confirm a schedule for the Plan update.

Scheduling Issues

The following basic schedule will be undertaken for monitoring, evaluating and updating the Plan:

- Monitoring activities by the OHSEP should be done on a quarterly basis at a minimum;
- Notices regarding annual evaluations should be sent by the OHSEP in December of the first two years of the Plan and in September of the third year.
- The timetable for evaluations and updates for the first two years is expected to last up to four months (January – April) and up to six months for the update in the third year for re-submittal to FEMA (November – April).

Note: The “Plan year” runs from May 1 to April 30 based on the original approval date of the Plan. This could be shifted in the next round of approvals to a more convenient or intuitive date (i.e., December 31), but that would require initiating the third year process four months earlier to allow adequate time for the full Plan update.

10.3 Monitoring Implementation of Mitigation Actions

Each mitigation project or activity (such as planning) has an established period of performance that OHSEP and FEMA monitor throughout the development and execution of the activity. As described in the *State of Louisiana Administrative Guidelines and Procedures* (see Volume IV of the State of Louisiana Hazard Mitigation Strategy), OHSEP uses the following system for monitoring mitigation projects and project closeouts.

Monitoring Mitigation Projects

Mitigation projects are generally monitored as follows:

- OHSEP regularly meets with representatives from FEMA Region VI to coordinate project monitoring activities.
- Every calendar quarter, OHSEP sends letters to all subgrantees with open projects (i.e., ones that have been funded but are not completed), requesting a project progress update.
- Each of the subgrantees responds to the OHSEP request by preparing a standard report that details progress on individual mitigation projects, and indicates percent complete.
- OHSEP compiles the subgrantee progress reports and produces a consolidated quarterly report that is sent to FEMA Region VI for review. The consolidated quarterly report identifies changes from previous reports, areas of concern, and strategies to address problems.

Monitoring Project Closeouts

Mitigation project closeouts generally occur in the following sequence. These procedures are established in the *State of Louisiana Administrative Guidelines and Procedures* - Volume IV of the State of Louisiana Hazard Mitigation Strategy in accordance with FEMA requirements for State Administrative Plans and HMGP guidelines as set out in the HMGP Desk Reference.

- Subgrantee indicates in a quarterly project progress report that a mitigation project is 100 percent complete.
- OHSEP reconciles the FEMA SmartLink account for the project (by disaster).
- OHSEP initiates a comprehensive internal financial audit of the project.
- OHSEP works with subgrantees to resolve any issues discovered in the audit.
- OHSEP sends FEMA Region VI a closeout letter that identifies the final eligible cost of the project, de-obligations that are required, and any monies that will be recovered from the subgrantee.

10.4 Reviewing Progress on Achieving Goals

Subsection 201.4 (c)(5)(ii) of the IFR states that the State Hazard Mitigation Plan must include a system for reviewing progress on goals that are included in the Mitigation Action Plan (Section Eight).

In order to track progress on achieving the goals identified in this Plan, OHSEP will ensure that both the annual and three-year Plan evaluations include a detailed examination and analysis of the goals and the various actions that are intended to achieve them. Section Eight of the Plan describes four major hazard mitigation goals and describes various strategies and actions that the State is undertaking, or considering undertaking, to address the identified goals. In future versions of the Plan, OHSEP will indicate the status of the various actions, and a general indication of progress.

10.5 Reviewing Progress on Activities and Projects

Subsection 201.4 (c)(5)(iii) of the IFR states that the Plan must include a system for reviewing progress on activities and projects that are included in the Mitigation Action Plan.

As part of the yearly and three-year evaluations and updates to this Plan, OHSEP will initiate a review of all activities and projects noted in the Mitigation Action Plan. The review will take place in stages:

0. In cooperation with the SHMPC, OHSEP will assemble a working group from within the Committee to undertake a preliminary review and analysis of progress on activities and projects that are listed in Section Eight.
0. OHSEP and the working group will prepare a draft report that describes progress, remaining tasks and projected time to complete the tasks.
0. The draft report will be presented to the SHMPC during the meeting(s) related to the yearly (and three-year) updates.
0. After SHMPC review, comment and approval, results of the progress review will be included as a new or updated column in the tabulation of mitigation goals and actions in Section Eight
0. If requested by FEMA, OHSEP will prepare a summary report describing the results of the review.

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